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September 5, 2017

VIA ECF

Honorable George B. Daniels
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Jonathan Feliz v. United States*
16-cv-4449
09-cr-195-02

Dear Judge Daniels:

I represent Jonathan Feliz on the above referenced matter. With the consent of the government, I respectfully request that the Court stay these proceedings until thirty days after the Second Circuit decides the rehearing petition in *United States v. Hill*, 14-3872 and its decision in *United States v. Barrett*, 14-2641. These two cases, which the Circuit is likely holding in abeyance until the Supreme Court resolves *Sessions v. Dimaya*, 15-1498, will determine the viability of Mr. Feliz's claim that the residual clause in 18 § U.S.C. 924(c) is void-for-vagueness.

If the Court denies this request to stay the proceedings, I will file our supplemental brief as directed on September 11, 2017.

Respectfully submitted,

_____/s/
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cc: AUSA Michael Maimin